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October 26, 2023

Hon. Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Keita, et al. (Jailyn Hilliard)
22-cr-435 (LAP)

Dear Judge Preska:

I am counsel for Jailyn Hilliard, one of the defendants in the above-captioned case pending before this Court. I write to request that the Court temporarily modify the condition of Ms. Hilliard's release that prevents her from traveling outside of the District of her residence other than as needed for Court appearances in the Southern District of New York.

Ms. Hilliard seeks permission to travel by car from her District of residence to Atlanta. She would leave this Friday, October 27, 2023, and return Sunday, October 29, 2023. Ms. Hilliard's sister, Jamil Dawson, graduated from Spelman College in Atlanta in 2020. Jamil now works as a Grants Analyst at the Arkansas Department of Homeland Security. She intends to travel to Atlanta to attend homecoming weekend at Spelman. Ms. Hilliard (Jailyn) would like to go with her sister to the events at Spelman and also to visit her other sister, Jalanda, who lives in Atlanta. Jailyn and Jamil would be accompanied on their trip by Ms. Hilliard's friend Falan Farr. Ms. Hilliard would stay with her sister Jalanda while in Atlanta.

For the past 15 month while the case has been pending, Ms. Hilliard has consistently followed the conditions of her release. Indeed, the Court recently granted my request, unopposed by the government or Pretrial Services, to remove the condition that she be subject to location monitoring. Ms. Hilliard has demonstrated that she understands the seriousness of her situation and can be relied on to comply with the conditions of her release.

granted
SO ORDERED

Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

10/26/23

I have consulted with the Pretrial Services Officer who is supervising Ms. Hilliard and with the Assistant United States Attorney who is representing the government in this case. Neither objects to this request.

Finally, I apologize for the lateness of this request. Ms. Hilliard and I had difficult connecting earlier in the week given our respective work schedules.

Respectfully submitted,

/s/
Stephanie M. Carvin

cc: AUSA Jane Chong (via ECF)
Pretrial Service Officer Melvin Siebenmorgen (via email)